

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, et al.,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

**MOTION FOR JOINDER OF CREDITOR R&D MASTER ENTERPRISES, INC.
TO: (A) MOTION TO DISQUALIFY MCKINSEY & COMPANY, INC. AND ITS
AFFILIATES (DOC. NO. 22,025), AND (B) MOTION TO DISQUALIFY
THE LAW FIRM O'NEILL & BORGES LLC (DOC. NO. 20,873)**

To the Honorable United States District Judge Laura Taylor Swain:

Comes now Creditor, R&D Master Enterprises, Inc., by and through the undersigned attorney, who respectfully requests and prays as follows:

1. Creditor R&D Master Enterprises, Inc., a corporation organized under the laws of the Commonwealth of Puerto Rico (the "Movant"), hereby joins in support of certain pending petitions under the Puerto Rico Recovery Accuracy in Disclosures Act of

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17- BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17- BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)

2021, 48 U.S.C. 2101 et seq. (hereinafter, “PRRADA”), to disqualify McKinsey & Company, Inc. and its affiliates (collectively, “McKinsey”) and the law firm O’Neill & Borges LLC (“O&B”), respectively, both of whom serve as advisors to the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), the sole representative of the Commonwealth of Puerto Rico, the Puerto Rico Electric Power Authority, and other covered instrumentalities in these Title III proceedings. In connection therewith, the Movant respectfully states and prays as follows.

2. The Movant is a creditor of the Commonwealth of Puerto Rico with standing to file this motion for joinder in these Title III proceedings.
3. The Movant hereby joins relator Carlos Lamoutte in support of the allegations that McKinsey and O&B have failed to make clear and transparent disclosures to the Court and to the U.S. Trustee Program under PRRADA and supplemental bankruptcy procedure disclosure standards, in relation to the unresolved disqualification pleadings that are the subject matter of Doc. Nos. 20,873, 20,923, 20,946, 20,989, 20,959, 21,094, 21,096, 21,124, 21,485, 21,572, 21,604, 21,854, 21,925, 21,938, 21,970, 21,975, 21,989, 21,990, 22,020, 22,025, 22,035, 22,090, 22,146, 22,216, 22,232, 22,320, 22,401, 22,404, 22,419, 22,468, 22,485, 22,487, 22,756, 22,779, and 22,800 (collectively, the “Disqualification Pleadings”).
4. The Movant hereby separately affirms and restates all allegations set forth in the Disqualification Pleadings filed to date by relator Carlos Lamoutte, as if fully made herein by the Movant.
5. The Movant is a creditor of the Commonwealth of Puerto Rico and has an interest in the Disqualification Pleadings that would not be represented or protected unless

Movant joins in the Disqualification Pleadings prior to their adjudication by the Court.

6. Therefore, the Movant petitions to be included in relator Carlos Lamoutte's Disqualification Pleadings in order to obtain the relief sought under PRRADA.

WHEREFORE, the Movant hereby respectfully petitions the Court to enter an Order granting Movant's joinder in support of the pending petitions to disqualify McKinsey and O&B, in substantially the form attached hereto as **Exhibit A**.

RESPECTFULLY SUBMITTED.

In San Juan, PR this 10th day of November 2022.

It is hereby certified that the foregoing motion was filed with the Clerk of the Court and notified to the parties, via the CM/ECF system of the Court.

S/Javier A Rivera-Vaquer
USDC-PR No. 225809

JOSE A RIVERA-CORDERO
JAVIER A RIVERA-VAQUER
PO BOX 192376
SAN JUAN, PR 00919-2376
TEL (787) 759-3634
EMAIL: jariva@rimerico.com